

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-454/84-75(DRS)

Docket No. 50-454

License No. CPPR-130

Licensee: Commonwealth Edison Company  
Post Office Box 767  
Chicago, IL 60690

Facility Name: Byron Station, Unit 1

Inspection At: Byron Station, Byron, IL

Inspection Conducted: October 10-12, 1984

Inspector: *H. A. Walker for*  
H. A. Walker

10/19/84  
Date

Approved By: *F. Hawkins*  
F. Hawkins, Chief  
Quality Assurance Programs Section

10/19/84  
Date

Inspection Summary

Inspection on October 10-12, 1984 (Report No. 50-454/84-75(DRS))

Areas Inspected: Routine announced inspection by a regional inspector of licensee action on previous inspection findings. The inspection involved a total of 28 inspector-hours on site.

Results: No items of noncompliance were identified.

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## DETAILS

### 1. Persons Contacted

#### Commonwealth Edison Company (CECo)

- J. S. Bitel, Director of Quality Assurance (Operations)
- \*W. B. Burkamper, Quality Assurance Supervisor (Operations)
- S. N. Campbell, Office Supervisor
- \*R. G. Gruber, Quality Assurance Engineer
- \*K. J. Hansing, Quality Assurance Superintendent
- \*R. Pleniewicz, Assistant Superintendent Operations
- \*R. J. Poche, Licensing Technical Staff
- R. E. Querio, Byron Station Superintendent
- \*D. A. Sible, Quality Assurance Engineer
- \*R. C. Ward, Assistant Superintendent, Administration and Supplies

#### U.S. NRC

- \*P. Brochman, Resident Inspector
- \*K. Connaughton, Resident Inspector
- \*J. M. Hinds, Jr., Senior Resident Inspector
- \*J. F. Streeter, Director, Byron Project Division

Other personnel were contacted as a matter of routine during the inspection.

\*Indicates those attending the exit meeting on October 12, 1984.

### 2. Licensee Action on Previous Inspection Findings

- a. (Closed) Unresolved Item (454/84-36-03(DRS)): Engineering drawing files at the Emergency Offsite Facility (EOF) in Dixon were updated every three weeks and were therefore not maintained current. The inspector reviewed the EOF update log and verified that drawing files at the EOF are updated weekly. Thirteen drawings were selected from the EOF files and were verified as the current issue.
- b. (Closed) Unresolved Item (454/84-36-04(DRS)): There were no established controls at the Byron station regarding manual location, revisions or changes. Procedure BAP 134G-14, entitled "Byron Station Vendor Manual Control", was written to provide these controls. Revision 0 of this procedure was issued for use on August 16, 1984. The inspector reviewed the procedure and found it to be acceptable.
- c. (Closed) Unresolved Item (454/84-40-02(DRS)): All certified level II inspectors were designated as alternates for the QC supervisor to the onsite review committee in all areas for which the QC supervisor was qualified. The inspector reviewed Revision 3 of BAP 1210-4 and Revision 1 of BAP 1210-T3, both issued September 11, 1984. These documents designate the alternates to the onsite review committee as

well as define the assigned discipline. Five alternates were specified for the QC supervisor and all were restricted to one discipline. This action is acceptable.

- d. (Closed) Unresolved Item (454/84-40-03(DRS)): When quality assurance personnel certifications expired there was no method to ensure that personnel were not assigned work in areas where they were not properly certified. The inspector reviewed the recently developed list of personnel certifications which is maintained current by Operations Quality Assurance and the quarterly certification status report prepared by the Quality Assurance Department. These documents provide a controlled method to ensure the assignment of qualified quality assurance personnel on specific work assignments.
- e. (Open) Open item (454/84-40-05(DRS)): This open item involved a concern over limited nuclear quality assurance experience of personnel assigned to the operations quality assurance organization. The inspector reviewed CECO files to determine the nuclear quality assurance experience levels of the twelve people assigned to operations quality assurance. The CECO response to this item was also reviewed. It was apparent from the wording and content of the response that the open item was not adequately addressed. The response was discussed with CECO quality assurance personnel and it was agreed that CECO would provide an amended response to this item. This item remains open pending an amended response by CECO and an evaluation of this response by the NRC.
- f. (Closed) Item of noncompliance (454/84-40-08(DRS)): A number of deficiencies were identified in the audit program which was implemented by the Byron Station quality assurance organization. The inspector reviewed the revised audit procedures which were issued on August 15, 1984, as well as action taken on each specific item noted in the noncompliance. Action taken in each case was adequate.
- g. (Closed) Open item (454/84-40-09(DRS)): The three audit procedures used by the Byron Station were not consistent in content and were difficult to follow. The inspector reviewed the revised procedures as indicated in item "f". The changes were satisfactory and the procedures are now acceptable.
- h. (Closed) Open Item (454/84-40-11(DRS)): Audit checklist used by operations quality assurance auditors contained general questions which appeared to result in inadequate verification of checklist items. The inspector reviewed the action taken to improve audit checklist preparation. A training session has been held on this subject and there appears to be more involvement by lead auditors in reviewing the checklists prior to use. The action taken is acceptable.
- i. (Closed) Open item (454/84-40-12(DRS)): In some cases audit records did not indicate if audits were performed by reviewing records, verification of hardware or witnessing of work performed. The

inspector reviewed training records addressing this subject. No problems were noted in the review of records for two current audits. Action on this item is acceptable.

- j. (Open) Unresolved item (454/84-40-14(DRS)): Byron Station Operations did not have a procedure which addressed trending of discrepancies by cause or discrepancy type. The inspector reviewed procedure BAP 1250-7, Revision 0 ("Deviation Trending Procedure"), which was issued for use on October 5, 1984. Cause codes used in this procedure were very broad in scope and the causes designated by the procedure appeared to address construction rather than operations. A review of trend reports and input information will be made on a subsequent inspection to ensure that the implemented procedure is effective in detecting repetitive quality problems.
- k. (Open) Open item (454/84-41-01(DRS)): Appropriate procedures were not in place for reporting modifications to the NRC as required by 10 CFR 50.59. The inspector reviewed procedure BAP 1650-1, Revision 1 ("Modification Processing Procedure"), which was issued on July 17, 1984. This procedure does not address the 10 CFR 50.59 requirement for annual reporting to the NRC of changes made to the facility and the safety evaluation of those changes. Pending revision of the appropriate procedures, this item will remain open.
- l. (Closed) Open item (454/84-41-02(DRS)): A quality program had not been developed for control of tests and experiments as defined in the Technical Specification and 10 CFR 50.59. The inspector reviewed procedure BAP 1310-8, Revision 0 ("Special Procedure/Tests/Experiments"), which was issued on October 10, 1984. The procedure adequately addressed the requirements.
- m. (Open) Open item (454/84-41-04(DRS)): A number of surveillance procedures did not require independent verification of valve and breaker lineups after testing. The inspector reviewed the action that had been taken on this item. The inspector was informed that approximately sixty percent of the procedures had been reviewed and revised as required. Due to the number of procedures involved, completion of this item is scheduled to take an additional four months. Interim control measures to ensure independent verification until procedural changes can be made are in place and are adequate to ensure verification. Pending completion of the procedural revisions, this item will remain open.
- n. (Open) Open item (454/84-41-05(DRS)): Two surveillance procedures which required independent verification of valve lineups had signatures which represented verification of approximately twenty valves. Independent signoffs for each valve were not required. The procedures involved in this item are identical as for open item (454/84-41-04(DRS) (see "m"). Pending revision of the two procedures, this item will remain open.

3. Other Inspection Items

During the review of open item 454/84-40-05(DRS), the inspector reviewed certification sheets for certified quality assurance inspectors. These sheets are updated annually and points are added for experience and training courses for the year. On three of the twelve certification sheets reviewed, the inspector noted that the total accumulated points allowed for experience was in excess of the points allowed in Quality Assurance Department Memorandum No. 7, Revision 2. No satisfactory explanation was provided during the inspection. This item is unresolved pending a review of the quality assurance inspector certification program at the CECO corporate QA office (454/84-75-01(DRS)).

No items of noncompliance or deviations were identified.

4. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. An unresolved item disclosed during the inspection is discussed in Paragraph 3.

5. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the Byron Plant on October 12, 1984, and summarized the purpose, scope and findings of the inspection.